

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF  
VENEZUELA,

Defendant.

C.A. No. 1:17-mc-00151-LPS

**NORTHROP GRUMMAN SHIP SYSTEMS, INC.'S  
ADDITIONAL JUDGMENT CREDITOR STATEMENT**

DATED: October 13, 2023

Respectfully submitted:

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Plaintiff and judgment creditor Northrop Grumman Ship Systems, Inc., f/k/a Ingalls Shipbuilding, Inc., and now known as Huntington Ingalls Incorporated (“Huntington Ingalls”), submits this statement pursuant to the Court’s October 11, 2023 Order requiring creditors seeking to be designated Additional Judgment Creditors under the Sale Procedures Order to submit a summary of the dates of all completed Steps, as outlined in the Court’s July 27 Memorandum Order, D.I. 646. *See* D.I. 738. As set out below and supported by the documentation exhibited to this submission, Huntington Ingalls has completed Steps 1 through 5 as of the date of this filing.

- **Step 1: Creditor Proves it is Owed Some Debt by a Venezuela Party.**
  - On February 19, 2018, an international arbitration tribunal seated in Brazil issued an award (the “Award”) against the Ministry of Defense of the Bolivarian Republic of Venezuela and in favor of Huntington Ingalls in the amount of \$128,862,457.27. *See* Ex. A (Award).
- **Step 2: Creditor Enforces its Award in a U.S. Court and Receives a Judgment.**
  - On June 4, 2020, the United States District Court for the Southern District of Mississippi entered a final judgment (the “Judgment”) enforcing the Award pursuant to the Inter-American Convention on International Commercial Arbitration of 1975 and the Federal Arbitration Act in the amount of \$137,977,646.43 plus post judgment interest pursuant to 28 U.S.C. § 1961. *See* Ex. B (Judgment); *see also* Ex. C (March 31, 2020 Memorandum Opinion and Order Granting Motion for Execution of Award); Ex. F (Opinion of the Fifth Circuit affirming the Judgment).
- **Step 3: Creditor Registers its Judgment in the District of Delaware.**
  - On July 31, 2020, Huntington Ingalls registered the Judgment in the District of Delaware in *Northrop Grumman Ship Systems, Inc. v. The Ministry of Defense of the Republic of Venezuela*, No. 1:20-mc-00257-LPS. *See* Ex. B, at pp. 6-7 (Letter Registering in the District of Delaware).
- **Step 4: Creditor Moves in Delaware for a Writ of Attachment *Fieri Facias* That Was Eventually Granted.**
  - On February 19, 2021, Huntington Ingalls filed its Amended Motion for Writ of Attachment *Fieri Facias*.<sup>1</sup> *See* Ex. D (Amended Motion for Writ of Attachment).

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<sup>1</sup> Huntington Ingalls first filed a motion for writ of attachment on September 15, 2020. However, priority among Additional Judgment Creditors is based upon the date of the motion that was eventually granted. *See* 1:17-mc-151, D.I. 646 at 23.

- **Step 5: Creditor Obtains a Writ of Attachment *fi. fa.* which may be Conditioned on Subsequent Events.**
  - On March 23, 2023, this Court conditionally granted Huntington Ingalls' Amended Motion for Writ of Attachment. *See* Ex. E (Order).

In accordance with the Court's October 11, 2023 Order, Huntington Ingalls will make further filings within three business days of completing any additional Steps.

DATED: October 13, 2023

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